

EXHIBIT B

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Via Federal Express

May 16, 2005

Caitlin Lhommedieu, Esq.
Greenblum & Bernstein, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191-1411

**Re: BIS Advanced Software Systems, Ltd. v. Red Bend Software, Inc., et al.,
Civil Action No. 04-11960**

Dear Caitlin:

This letter is in response to your letter of May 13, 2005 following our telephone conference of the same day.

First, I disagree with your characterization of events concerning the Protective Order. However, because nothing will be served by detailing my understanding of events and the reasons for my disagreement, I will not do so at this time.

Second, you demand that we produce documents responsive to your discovery requests. Based on the text of your letter, it is unclear whether you are referring to the first round of documents that I had already represented would be produced as soon as we received sufficient assurance as to their appropriate protection. To the extent that your demand encompasses more than those documents that we specifically discussed on Friday afternoon, I disagree with your assertion that we have "had our meet and confer conference."

Third, enclosed are two CDs. Please note that, as previously discussed, the first CD (Bates numbered RB 0000001) contains source code. As contemplated by the draft Protective Order, that CD is marked "HIGHLY CONFIDENTIAL RESTRICTED MAGNETIC and/or DIGITAL MEDIA," and should be treated accordingly. The remaining documents being produced today (contained on the second CD and marked on the electronic pages as Bates numbers RB0000002 - RB0000119) are marked HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY. Pursuant to your May 13, 2005 letter, we understand that all of these documents will be kept "ATTORNEYS' EYES ONLY" until entry of the Protective Order, and that thereafter they shall be treated appropriately under the Protective Order.

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Finally, pursuant to your previous agreement with Ethan Horwitz, we will continue to produce documents on a rolling basis going forward.

Very truly yours,



Anastasia M. Fernands

AMF:
Enclosures

cc: Daniel P. Tighe, Esq. (*w/out encl.*)
Bruce E. Falby, Esq. (*w/out encl.*)
Ethan Horwitz, P.C. (*w/out encl.*)